

DMB:SA/SDD/RMT
F.#2012R01574

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

S U P E R S E D I N G
I N D I C T M E N T

- against -

ALI YASIN AHMED,
also known as "Ismail,"
MADHI HASHI,
also known as "Talha," and
MOHAMED YUSUF,
also known as "Abu Zaid,"
"Hudeyfa" and
"Mohammed Abdulkadir,"

Cr. No. 12-661(S-1)(SLT)
(T. 18, U.S.C., §§
924(c)(1)(A)(ii),
924(c)(1)(A)(iii),
924(c)(1)(B)(ii),
2339B(a)(1), 2339B(d),
2 and 3551 et seq.)

Defendants.

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THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Provide Material Support
to a Foreign Terrorist Organization)

In or about and between December 2008 and August 2012,
both dates being approximate and inclusive, within the
extraterritorial jurisdiction of the United States, the
defendants ALI YASIN AHMED, also known as "Ismail," MADHI HASHI,
also known as "Talha," and MOHAMED YUSUF, also known as "Abu
Zaid," "Hudeyfa" and "Mohammed Abdulkadir," together with others,
did knowingly and intentionally conspire to provide material
support and resources, as defined in Title 18, United States
Code, Section 2339A(b), including services, currency, weapons and

personnel, including themselves, to a foreign terrorist organization, to wit: al-Shabaab.

(Title 18, United States Code, Sections 2339B(a)(1), 2339B(d) and 3551 et seq.)

COUNT TWO

(Providing Material Support to a Foreign Terrorist Organization)

In or about and between December 2008 and August 2012, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants ALI YASIN AHMED, also known as "Ismail," MADHI HASHI, also known as "Talha," and MOHAMED YUSUF, also known as "Abu Zaid," "Hudeyfa" and "Mohammed Abdulkadir," together with others, did knowingly and intentionally provide material support and resources, as defined in 18 U.S.C. § 2339A(b), including services and personnel, including themselves, to a foreign terrorist organization, to wit: al-Shabaab.

(Title 18, United States Code, Sections 2339B(a)(1), 2339B(d), 2 and 3551 et seq.)

COUNT THREE

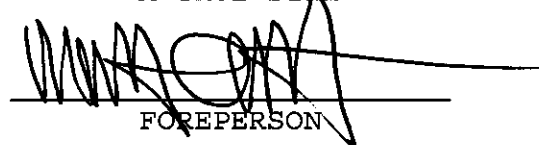
(Use of Firearms)

In or about and between December 2008 and August 2012, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants ALI YASIN AHMED, also known as "Ismail," MADHI HASHI, also known as "Talha," and MOHAMED YUSUF, also known as "Abu

Zaid," "Hudeyfa" and "Mohammed Abdulkadir," together with others, did knowingly and intentionally use and carry one or more firearms during and in relation one or more crimes of violence, to wit: the crimes charged in Counts One and Two, and did knowingly and intentionally possess such firearms in furtherance of said crimes of violence, one or more of which firearms was brandished and discharged, and one or more of which firearms was a machinegun.

(Title 18, United States Code, Sections 924(c) (1) (A) (ii), 924(c) (1) (A) (iii), 924(c) (1) (B) (ii), 2 and 3551 et seq.)

A TRUE BILL


FOREPERSON


LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. 12 CR 661 (S-1) (SLT)

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK
CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

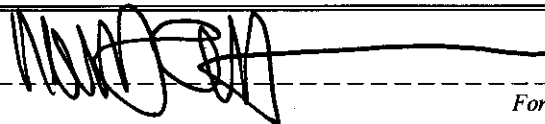
ALI YASIN AHMED et al.,

Defendants.

SUPERSEDING INDICTMENT

(T. 18, U.S.C., §§ 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 924(c)(1)(B)(ii), 2339B(a)(1), 2339B(d), 2 and 3551 et seq.)

A true bill.



Foreman

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

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